

# Exhibit G





William R. Poynter, Esq.  
757-238-6383  
wpoynter@kaleolegal.com

January 16, 2018

**VIA OVERNIGHT MAIL**

MOZAICO  
1591 Lighthouse Drive  
Naperville, Illinois, 60565

**Re: Willful Trademark and Copyright Infringement**

Dear Sir:

This firm represents New Ravenna Mosaics, which is America's premier designer and manufacturer of stone and glass mosaic tiles for both residential and commercial installations. New Ravenna Mosaics are sold through nearly 200 exclusive designer showrooms across the country and internationally, and the company provides design services along with on-site supervision of installations. New Ravenna Mosaics have been featured in national architectural and interior design magazines and are found in homes, restaurants, hotels, casinos and businesses around the world.

New Ravenna is the exclusive owner of all copyrights and other intellectual property rights in the mosaic tile designs and marks that appear on the New Ravenna website at [www.newravenna.com](http://www.newravenna.com) ("New Ravenna Designs"). As a result of New Ravenna's exclusive and widespread advertising, use and promotion over more than twenty years, the New Ravenna Designs are widely recognized by consumers as a designation of New Ravenna's goods and services, and New Ravenna has developed extensive goodwill in its New Ravenna Designs.

New Ravenna has previously informed you of your infringement of several of its copyrighted designs, by letter dated May 12, 2015, which was returned signed and acknowledged by your company (a copy of which is enclosed as Exhibit B). Unfortunately, it has again come to our attention that you are offering a multitude of mosaic tile designs that are identical and/or substantially similar to many of the New Ravenna Designs. Attached hereto as Exhibit A is a complete list of those designs together with the online locations where each can be found.

Because you do not have permission from New Ravenna, your use of the New Ravenna Designs set forth on Exhibit A constitutes copyright infringement under The Copyright Act, 17 USC § 101 et al., and potentially trade dress infringement and unfair competition under the Lanham Act, 15 USC § 1125, as well. As a result of this conduct, New Ravenna is entitled to preliminary and permanent injunctive relief against your continued use of the New Ravenna Designs, in addition to recovering its damages and costs. What is more, because of the nature of the infringement, and the fact that Mozaico is now a serial and willful infringer of so many New Ravenna Designs, New Ravenna will be entitled to recover trebled damages and attorney fees in any lawsuit to enforce its rights.



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We therefore demand that you immediately cease all uses of the New Ravenna Designs, and any other New Ravenna designs or intellectual property, within seven days of receipt of this letter, and confirm in writing that you have done so, including the removal of all references to New Ravenna or its designs from all advertising, promotional materials, in store displays, and websites. We also demand that you confirm your agreement in writing never to use the New Ravenna Designs, trade dress, trademarks, or other intellectual property by signing below. If we do not receive written confirmation within seven days, we will advise our client to pursue all legal remedies available to it.

New Ravenna appreciates your respect for its intellectual property. Please contact me as soon as possible to discuss resolution of this matter. I look forward to hearing from you.

Very truly yours,



William R. Poynter

SEEN AND AGREED:

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Mozaico

cc: New Ravenna Mosaics  
William P. Dickinson, III, Esq.





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## EXHIBIT A

Products found at the following locations:

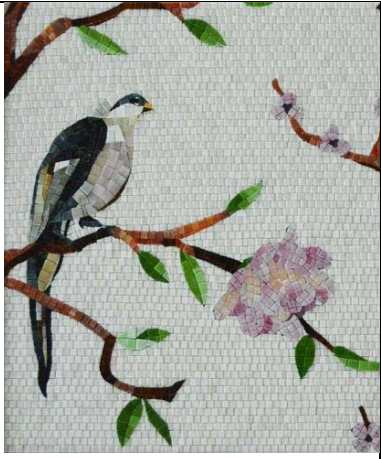



Mosaico website: [www.mozaico.com](http://www.mozaico.com)

Mosaico Instagram: [www.instagram.com/mozaico](https://www.instagram.com/mozaico)

MOSAICO	NEW RAVENNA	PRODUCT INFO
		<p>Mozaico:            Blue Bird in Petal            MP026            Web:  <a href="https://www.mozaico.com/collections/birds-and-butterflies/products/mosaics-designs_birds-and-butterflies_mosaic-tile-art-blue-bird-in-petal_mp026">https://www.mozaico.com/collections/birds-and-butterflies/products/mosaics-designs_birds-and-butterflies_mosaic-tile-art-blue-bird-in-petal_mp026</a>            Instagram:            1. <a href="https://www.instagram.com/p/BR_h0wigvaK/?taken-by=mozaico">https://www.instagram.com/p/BR_h0wigvaK/?taken-by=mozaico</a>            2. <a href="https://www.instagram.com/p/BAgu5dwA6jX/?taken-by=mozaico">https://www.instagram.com/p/BAgu5dwA6jX/?taken-by=mozaico</a>            3. <a href="https://www.instagram.com/p/kq7aOag6g9/?taken-by=mozaico">https://www.instagram.com/p/kq7aOag6g9/?taken-by=mozaico</a>            4. <a href="https://www.instagram.com/p/Bc_qEMxFhpH/?taken-by=mozaico">https://www.instagram.com/p/Bc_qEMxFhpH/?taken-by=mozaico</a></p> <p>New Ravenna: Chinoiserie  <a href="http://newravenna.photoshelter.com/image/I0000jvhiQHeqhj0">http://newravenna.photoshelter.com/image/I0000jvhiQHeqhj0</a></p>
		<p>Mozaico:            Birds and Florals            GA019  <a href="https://www.mozaico.com/collections/birds-and-florals/products/mosaics-designs_birds-and-florals_mosaic-tile-art-birds-and-florals_ga019">https://www.mozaico.com/collections/birds-and-florals/products/mosaics-designs_birds-and-florals_mosaic-tile-art-birds-and-florals_ga019</a></p>









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		<p><a href="#">ns/birds-and-butterflies/products/mosaics-designs_birds-and-butterflies_mosaic-designs-birds-and-florals_ga019</a></p> <p>New Ravenna: Chinoiserie <a href="http://newravenna.photoshelter.com/image/I0000h3awkG5NZ9E">http://newravenna.photoshelter.com/image/I0000h3awkG5NZ9E</a></p>
		<p>Mozaico: Zilij Geometric Flower MP199 Web: <a href="https://www.mozaico.com/collectio ns/patterns/products/mosaics-designs_patterns_zillij-geometric-flower-patterns-mosaic-stone-art_mp199">https://www.mozaico.com/collectio ns/patterns/products/mosaics-designs_patterns_zillij-geometric-flower-patterns-mosaic-stone-art_mp199</a> Instagram: <a href="https://www.instagram.com/p/Bc5ZhDSFXjL/?taken-by=mozaico">https://www.instagram.com/p/Bc5ZhDSFXjL/?taken-by=mozaico</a></p> <p>New Ravenna: Granada <a href="http://newravenna.photoshelter.com/image/I0000pgce3G3VET8">http://newravenna.photoshelter.com/image/I0000pgce3G3VET8</a></p>
		<p>Mozaico: Patterned Floral Mosaic Design MG316 Web: <a href="https://www.mozaico.com/collectio ns/patterns/products/mosaics-designs_patterns_patterned-floral-">https://www.mozaico.com/collectio ns/patterns/products/mosaics-designs_patterns_patterned-floral-</a></p>



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		<p><a href="#">design-on-marble-mosaic-tile-art_mg316</a> Instagram: <a href="https://www.instagram.com/p/BY_ZbuxFUDk/?taken-by=mozaico">https://www.instagram.com/p/BY_ZbuxFUDk/?taken-by=mozaico</a></p> <p>New Ravenna: Marabel <a href="http://newravenna.photoshelter.com/image/I0000iMpiLC2qilQ">http://newravenna.photoshelter.com/image/I0000iMpiLC2qilQ</a></p>
		<p>Mozaico: Stone Mosaic Design – Catch the Wave MSA314 Web: <a href="https://www.mozaico.com/collections/patterns/products/mosaics-designs_patterns_stone-mosaic-design-catch-the-wave_msa314">https://www.mozaico.com/collections/patterns/products/mosaics-designs_patterns_stone-mosaic-design-catch-the-wave_msa314</a> Instagram: <a href="https://www.instagram.com/p/BbcrRsfl9cS/?taken-by=mozaico">https://www.instagram.com/p/BbcrRsfl9cS/?taken-by=mozaico</a></p> <p>New Ravenna: Mirage <a href="http://newravenna.photoshelter.com/image/I0000HGnqcVO43Mk">http://newravenna.photoshelter.com/image/I0000HGnqcVO43Mk</a></p>
		<p>Mozaico: Peacock Feather Micro Mosaic M1008 <a href="https://www.mozaico.com/collections/others/products/mosaics-designs_others_peacock-feather-">https://www.mozaico.com/collections/others/products/mosaics-designs_others_peacock-feather-</a></p>









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		<p><a href="#">micro-mosaic-stone-artwork-mural_mi008</a></p> <p>New Ravenna: Peacock <a href="http://newravenna.photoshelter.com/image/I0000kPbQ_5RPn4I">http://newravenna.photoshelter.com/image/I0000kPbQ_5RPn4I</a></p>
		<p>Mozaico: Flower Mosaic Square – Nalia MG326 Web: <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_flower-mosaic-square-nalia_mg326">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_flower-mosaic-square-nalia_mg326</a> Instagram: 1. <a href="https://www.instagram.com/p/BQlu9FpASQu/?taken-by=mozaico">https://www.instagram.com/p/BQlu9FpASQu/?taken-by=mozaico</a> 2. <a href="https://www.instagram.com/p/yY-r5hg6pe/?taken-by=mozaico">https://www.instagram.com/p/yY-r5hg6pe/?taken-by=mozaico</a></p> <p>New Ravenna: Aurelia <a href="http://newravenna.photoshelter.com/image/I00003GEoUX0LrKA">http://newravenna.photoshelter.com/image/I00003GEoUX0LrKA</a></p>
		<p>Mozaico: Mosaic Designs – Moonchild MG341 Web: <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_flower-mosaic-square-nalia_mg326">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_flower-mosaic-square-nalia_mg326</a></p>



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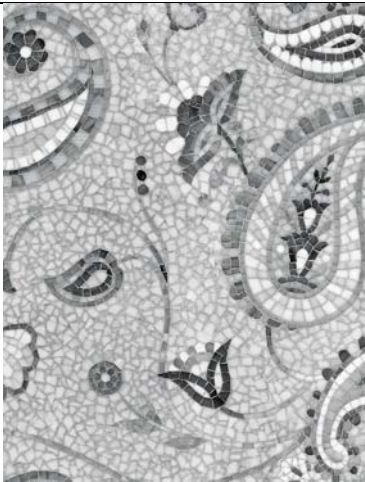
		<p><a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs-geometric-mosaic-designs-moonchild_mg341">ns/geometric/products/mosaics-designs-geometric-mosaic-designs-moonchild_mg341</a> Instagram: <a href="https://www.instagram.com/p/BPAv2akITBT/?taken-by=mozaico">https://www.instagram.com/p/BPAv2akITBT/?taken-by=mozaico</a></p> <p>New Ravenna: Perrault <a href="http://newravenna.photoshelter.com/image/I0000bf7Gmm2zE6M">http://newravenna.photoshelter.com/image/I0000bf7Gmm2zE6M</a></p>
		<p>Mozaico: Abstract Mosaic Art – Roman Floral MP189 <a href="https://www.mozaico.com/collections/patterns/products/mosaics-designs-flowers-and-trees-abstract-mosaic-art-roman-floral_mp189">https://www.mozaico.com/collections/patterns/products/mosaics-designs-flowers-and-trees-abstract-mosaic-art-roman-floral_mp189</a></p> <p>New Ravenna: Climbing Vine <a href="http://newravenna.photoshelter.com/image/I0000wvQlrx93Do">http://newravenna.photoshelter.com/image/I0000wvQlrx93Do</a></p>
		<p>Mozaico: Dragonflies MB045 <a href="https://www.mozaico.com/collections/borders/products/mosaics-designs-borders-mosaic-patterns-dragonflies_mb045">https://www.mozaico.com/collections/borders/products/mosaics-designs-borders-mosaic-patterns-dragonflies_mb045</a></p> <p>New Ravenna: Dragonflies border <a href="http://newravenna.photoshelter.com/image/I0000woB9x.q2xJQ">http://newravenna.photoshelter.com/image/I0000woB9x.q2xJQ</a></p>
		<p>Mozaico: Mosaic Designs – Bottles Pattern MP028 <a href="https://www.mozaico.com/collections/patterns/products/mosaics-designs-patterns-mosaic-designs-bottles-pattern_mp028">https://www.mozaico.com/collections/patterns/products/mosaics-designs-patterns-mosaic-designs-bottles-pattern_mp028</a></p>



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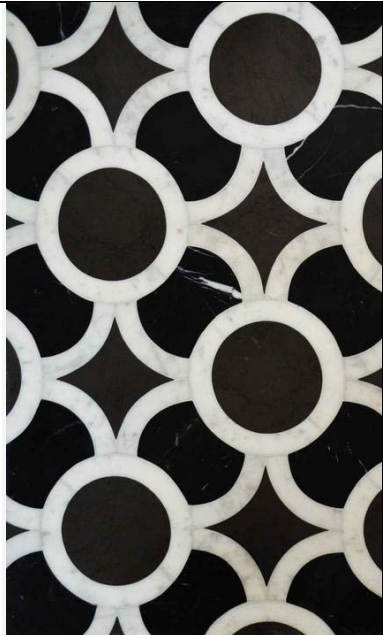





		<p>New Ravenna: Bottles <a href="http://newravenna.photoshelter.com/image/I0000Ln56lIdfu9g">http://newravenna.photoshelter.com/image/I0000Ln56lIdfu9g</a></p>
		<p>Mozaico: MG324 <a href="https://www.mozaico.com/collections/patterns/products/mosaics-designs_patterns_paisley-floral-mosaic_mg324">https://www.mozaico.com/collections/patterns/products/mosaics-designs_patterns_paisley-floral-mosaic_mg324</a></p> <p>New Ravenna: Paisley Vine <a href="http://newravenna.photoshelter.com/image/I0000asoOF0XUzQQ">http://newravenna.photoshelter.com/image/I0000asoOF0XUzQQ</a></p>
		<p>Mozaico: Mosaic Designs: Black Iznik MP201 <a href="https://www.mozaico.com/collections/geometric/products/mosaics-">https://www.mozaico.com/collections/geometric/products/mosaics-</a></p>



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		<p><a href="#">designs_geometric_mosaic-designs-black-iznik_mp201</a></p> <p>New Ravenna: Ann Sacks Beau Monde Montgomery</p> <p><a href="http://newravenna.photoshelter.com/image/I0000.OCeEliwwgM">http://newravenna.photoshelter.com/image/I0000.OCeEliwwgM</a></p>
		<p>Mozaico: White Iznik MP200</p> <p><a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_mosaic-designs-white-iznik_mp200">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_mosaic-designs-white-iznik_mp200</a></p> <p>New Ravenna: Ann Sacks Beau Monde Coco</p> <p><a href="http://newravenna.photoshelter.com/image/I0000oO82QFArCJQ">http://newravenna.photoshelter.com/image/I0000oO82QFArCJQ</a></p>
		<p>Mozaico: Mosaic Pattern: Bright Amaryllis MF459</p> <p><a href="https://www.mozaico.com/collections/flowers-and-trees/products/mosaics-">https://www.mozaico.com/collections/flowers-and-trees/products/mosaics-</a></p>









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		<p><a href="#">designs flowers-and-trees_mosaic-pattern-bright-amaryllis_mf459</a></p> <p>New Ravenna: Tamsin  <a href="http://newravenna.photoshelter.com/image/I0000ycovrzWrSgo">http://newravenna.photoshelter.com/image/I0000ycovrzWrSgo</a></p>
		<p>Mozaico: Moroccan Floral Pattern Petal Design              MP030  <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_moroccan-floral-pattern-petal-mosaic-design_mp030">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_moroccan-floral-pattern-petal-mosaic-design_mp030</a></p> <p>New Ravenna: Reina  <a href="http://newravenna.photoshelter.com/image/I00006CP6xEVWb10">http://newravenna.photoshelter.com/image/I00006CP6xEVWb10</a></p>
		<p>Mozaico: Pietra Dura Mosaic Wallpaper Modern Floral Pattern              MP024  <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_pietra-dura-mosaic-wallpaper-modern-floral-pattern_mp024">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_pietra-dura-mosaic-wallpaper-modern-floral-pattern_mp024</a></p> <p>New Ravenna: Avila  <a href="http://newravenna.photoshelter.com/image/I0000odjdy_dveH4">http://newravenna.photoshelter.com/image/I0000odjdy_dveH4</a></p>









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		<p>Mozaico: Waves Petal Mosaic Design MP023 <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_waves-petal-mosaic-design_mp023">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_waves-petal-mosaic-design_mp023</a></p> <p>New Ravenna: Oasis <a href="http://newravenna.photoshelter.com/image/I0000h2SEagqtf8Q">http://newravenna.photoshelter.com/image/I0000h2SEagqtf8Q</a></p>
		<p>Mozaico: Floral Mosaic Black and White Wallpaper MP027 <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_floral-mosaic-black-and-white-wallpaper_mp027">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_floral-mosaic-black-and-white-wallpaper_mp027</a></p> <p>New Ravenna: Tamara <a href="http://newravenna.photoshelter.com/image/I0000eRwlynM12cw">http://newravenna.photoshelter.com/image/I0000eRwlynM12cw</a></p>
		<p>Mozaico: Geometric Mosaic Pattern – Orlandia MG360 <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_geometric-mosaic-pattern-orlandia_mg360">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_geometric-mosaic-pattern-orlandia_mg360</a></p>



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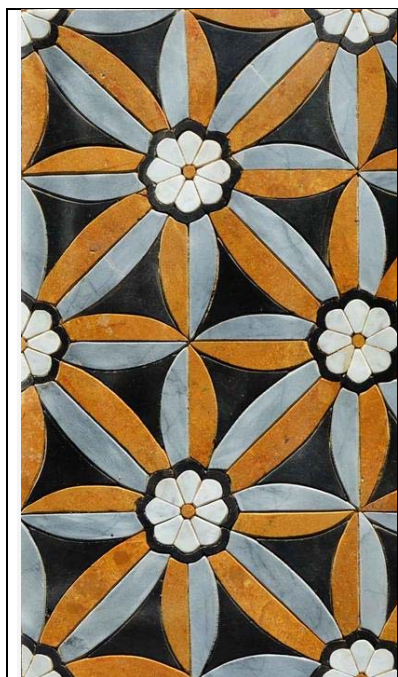
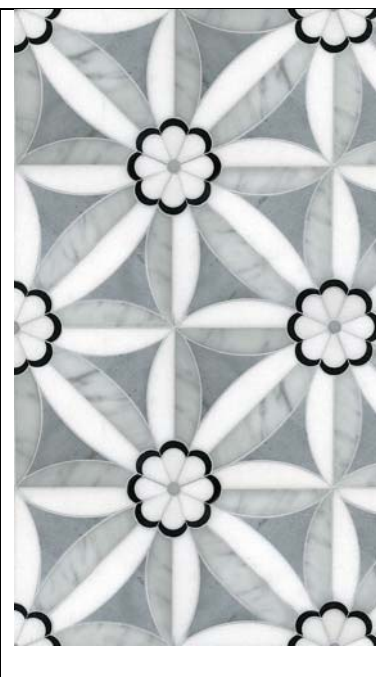


		<p>New Ravenna: Luxor  <a href="http://newravenna.photoshelter.com/image/I0000woBpOhcF4yo">http://newravenna.photoshelter.com/image/I0000woBpOhcF4yo</a> </p>
		<p>Mozaico: Mosaic Square Accent – Florencia  MP215  <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_mosaic-square-accent-florencia_mp215">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_mosaic-square-accent-florencia_mp215</a>  New Ravenna: Talya Rumi  <a href="http://newravenna.photoshelter.com/image/I00006vyxkZXHPLg">http://newravenna.photoshelter.com/image/I00006vyxkZXHPLg</a> </p>
		<p>Mozaico: Floral Pattern Petal Tile Mural  MP029  Web:  <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_floral-pattern-petal-tile-mural_mp029">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_floral-pattern-petal-tile-mural_mp029</a>  Instagram:  <a href="https://www.instagram.com/p/pJMI LNq6qb/?taken-by=mozaico">https://www.instagram.com/p/pJMI LNq6qb/?taken-by=mozaico</a> </p>



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		<p>New Ravenna: Edie <a href="http://newravenna.photoshelter.com/image/I0000COI1XDhLma8">http://newravenna.photoshelter.com/image/I0000COI1XDhLma8</a></p>
		<p>Mozaico: unnamed Instagram: <a href="https://www.instagram.com/p/mDP59eg6ik/?taken-by=mozaico">https://www.instagram.com/p/mDP59eg6ik/?taken-by=mozaico</a> New Ravenna: Forks, Knives, Spoons <a href="http://newravenna.photoshelter.com/image/I0000Vy.L3WUzC.8">http://newravenna.photoshelter.com/image/I0000Vy.L3WUzC.8</a></p>



# EXHIBIT B



**William R. Poynter**  
Office 757.238.6383  
Fax 757.304.6175  
wpoynter@kaleolegal.com

**Tina Bingham**  
Office 757.963.7261  
Fax 757.304.6175  
tbingham@kaleolegal.com

**Brian Wainger**  
Office 757.965.6804  
Fax 757.304.6175  
bwainger@kaleolegal.com

May 12, 2015

## VIA OVERNIGHT MAIL

**MOZAICO**  
1591 Lighthouse Drive  
Naperville, Illinois, 60565

### **Re: Trademark and Copyright Infringement**

Dear Sir:

This firm represents New Ravenna Mosaics, which is America's premier designer and manufacturer of stone and glass mosaic tiles for both residential and commercial installations. New Ravenna Mosaics are sold through nearly 200 exclusive designer showrooms across the country and internationally, and the company provides design services along with on-site supervision of installations. New Ravenna Mosaics have been featured in national architectural and interior design magazines and are found in homes, restaurants, hotels, casinos and businesses around the world.

New Ravenna is the exclusive owner of all copyrights and other intellectual property rights in the mosaic tile designs and marks that appear on the New Ravenna website at [www.newravenna.com](http://www.newravenna.com) ("New Ravenna Designs"). As a result of New Ravenna's exclusive and widespread advertising, use and promotion over more than twenty years, the New Ravenna Designs are widely recognized by consumers as a designation of New Ravenna's goods and services, and New Ravenna has developed extensive goodwill in its New Ravenna Designs.

It has come to our attention that you are offering mosaic tile designs that are identical and/or substantially similar to many of the New Ravenna Designs. Below is a complete list of those designs with the New Ravenna Design name on the left and your reference number on the right:

Climbing Vine	MP 189
Climbing Vine	MP 189A
Climbing Vine	MP 189B
Waterworks Parramore Ringle	MG288
Waterworks Parramore Razmatazz	MG287
Oasis	MP023
Paul Schatz Avila	MP024
Erin Adams Forks,Knives,Spoons	MP025
Tamara	MP027
Erin Adams Bottles	MP028
Edie	MP029



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Paul Schatz Reina	MP030
Waterworks Parramore Oval Overlay	MSA305
Waterworks Parramore Razmatazz	MSA308
Paisley Vine	MG324

Because you do not have permission from New Ravenna, your use of the New Ravenna Designs constitutes copyright infringement under The Copyright Act, 17 USC§ 101 et al., and potentially trade dress infringement and unfair competition under the Lanham Act, 15 USC § 1125, as well. As a result of this conduct, New Ravenna is entitled to preliminary and permanent injunctive relief against your continued use of the New Ravenna Designs, in addition to recovering its damages and costs, and potentially trebled damages and attorney fees.

We therefore demand that you immediately cease all uses of the New Ravenna Designs, and any other New Ravenna designs or intellectual property, within seven days of receipt of this letter, and confirm in writing that you have done so, including the removal of all references to New Ravenna or its designs from all advertising, promotional materials, in store displays, and websites. We also demand that you confirm your agreement in writing never to use the New Ravenna Designs, trade dress, trademarks, or other intellectual property by signing below. If we do not receive written confirmation within seven days, we will advise our client to pursue all legal remedies available to it.

New Ravenna appreciates your respect for its intellectual property. Please contact me as soon as possible to discuss resolution of this matter. I look forward to hearing from you.

Very truly yours,



William R. Poynter

SEEN AND AGREED:



Mozaico

cc: New Ravenna Mosaics  
Brian A. Wainger, Esq.  
Tina P. Bingham, Esq.